

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

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UNITED STATES OF AMERICA  
*ex rel.* ERMA LEE,

Plaintiffs,

v.

TARRANT COUNTY HOSPITAL  
DISTRICT d/b/a JPS HEALTH NETWORK,

Defendant.

Civil Action No. 4:19-cv-00412-P

**JOINT STIPULATION OF DISMISSAL AND**  
**CONSENT OF THE UNITED STATES TO DISMISSAL**

Pursuant to Rule 41(a)(1)(a)(ii) of the Federal Rules of Civil Procedure and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), Erma Lee (Relator) and Tarrant County Hospital d/b/a JPS Health Network (JPS) (collectively, the Parties), with the consent of the United States of America, jointly stipulate to the dismissal of the above-captioned action based on the terms of the Settlement Agreement between the United States and the Parties effective August 17, 2021. In accordance with the Settlement Agreement, the Parties jointly stipulate to dismiss the claims asserted in this action as to JPS: (1) with prejudice as to Relator; (2) with prejudice as to the United States for the Covered Conduct set out in Section E of the Settlement Agreement; and (3) without prejudice as to the United States as to any other claims.

Respectfully Submitted,

Date: August 17, 2021

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*JL - L*

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Date: August 12, 2021

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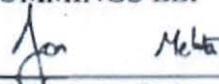
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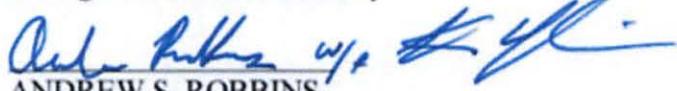
*Counsel for Defendant Tarrant County  
Hospital District*

**CONSENT OF UNITED STATES TO DISMISSAL**

Pursuant to 31 U.S.C. § 3730(b)(1), the United States consents to the dismissal of the action as follows: (a) with prejudice as to the United States for claims the United States has against JPS under the False Claims Act, 31 U.S.C. §§ 3729-3733, for the Covered Conduct set out in Section E of the Settlement Agreement; and (b) without prejudice as to the United States as to any other claim.

The United States consents to such dismissal because it is pursuant to a Settlement Agreement that is fair, adequate, and reasonable.

PRERAK SHAH  
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*Counsel for the United States*

**CERTIFICATE OF SERVICE**

On August 17, 2021, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).



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Joshua M. Russ